

BEFORE THE  
POSTAL REGULATORY COMMISSION

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PERIODIC REPORTING  
(PROPOSAL FOUR)

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: Docket No. RM2016-12  
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UNITED PARCEL SERVICE, INC.'S MOTION FOR  
EXTENSION OF TIME TO FILE COMMENTS REGARDING  
PROPOSAL FOUR  
(September 29, 2016)

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United Parcel Service, Inc. ("UPS") respectfully submits this Motion for an Extension of Time to File Comments Regarding Proposal Four.

On August 22, 2016, the United States Postal Service ("Postal Service") filed a petition with the Commission requesting that it initiate a rulemaking proceeding to consider a proposal to change analytical principles relating to the Postal Service's periodic reports. See Petition Of The United States Postal Service For The Initiation Of A Proceeding To Consider Proposed Changes In Analytical Principles (Proposal Four), Dkt. No. RM2016-12 (Aug. 22, 2016). The proposal, Proposal Four, concerns the treatment of purchased highway transportation costs within the Cost and Revenue Analysis report.

On August 24, 2016, the Commission established the instant docket for consideration of Proposal Four. See Notice Of Proposed Rulemaking On Analytical Principles Used In Periodic Reporting (Proposal Four), Dkt. No. RM2016-12 (Aug. 24, 2016). In doing so, the Commission set October 7, 2016 as the date on which interested persons are to submit comments regarding the proposal. Since that time, the

Commission has issued multiple information requests seeking additional information from the Postal Service about Proposal Four. See e.g., Chairman's Information Request No. 1, Dkt. No. RM2016-12 (Sept. 1, 2016); Chairman's Information Request No. 2, Dkt. No. RM2016-12 (Sept. 23, 2016); Chairman's Information Request No. 3 ("ChIR No.3"), Dkt. No. RM2016-12 (Sept. 29, 2016).

Specifically, yesterday, on September 29, 2016, the Commission issued ChIR No. 3 and set October 5, 2016 as the deadline for the Postal Service to respond – just two days prior to the deadline for interested parties to submit comments regarding Proposal Four. Thus, in order to have sufficient time to review and analyze the Postal Service's responses to ChIR No. 3, UPS believes it will need additional time to prepare comments concerning Proposal Four.

Additionally, on September 29, 2016, UPS filed its Second Motion for Issuance of Information Request seeking additional information about the TRACS data and its impact on Proposal Four. See UPS's Second Motion for Information Request, Dkt. No. RM2016-12 (Sept. 29, 2016). The Commission has yet to rule on UPS's motion. If the Commission grants UPS's motion and issues another Chairman's Information Request to the Postal Service, additional time will be needed for UPS to review this information and to prepare informed comments in response to Proposal Four.

Accordingly, UPS respectfully requests an addition fourteen (14) days (October 21, 2016) days to submit comments in response to Proposal Four.

Respectfully submitted,

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